

**REQUIRED STATEMENT
TO ACCOMPANY ALL MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) **Dorothy J. Knight** Case No. 19-13496 Chapter 13
All Cases: Name of Moving Creditor **Ally Financial** Date Case Filed **May 9, 2019**

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing ____ or Date Plan Confirmed ____ November 19, 2019.

Chapter 7: ☐ No-Asset Report Filed on ____
☐ No-Asset Report not Filed, Date of Creditors Meeting ____

1. Collateral
a. ☐ Home _____
b. ☒ Car Year, Make and Model 2014 BUICK LACROSSE VIN:1G4GB5G33EF152800
c. ☐ Other _____

2. Balance Owed as of Petition Date \$ **21,200.87**
Total of all other Liens against Collateral \$ _____

3. Attach a payment history, or list the months post-petition for which full payment from the debtor was not Received: **May 2019 through July 2020**

4. Estimated Value of Collateral (must be supplied in all cases) \$ **11,600.00**

5. Default
a. ☐ Pre-Petition Default
Number of months _____ Amount \$ _____
b. ☐ Post-Petition Default
☒ On direct payments to the moving creditor
Number of months **May 2019 through July 2020** Amount \$ **6,899.40, which amount**
includes attorney fees and costs of \$681.00
☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations
a. ☒ Lack of Adequate Protection § 362 (d)(1)
i. ☒ No insurance _____
ii. ☐ Taxes unpaid _____ Amount \$ _____
iii. ☒ Rapidly depreciating asset _____
iv. ☐ Other (describe) _____
b. ☒ No Equity and not Necessary for an Effective Reorganization § 362 (d)(2)
c. Other "Cause" § 362 (d)(1)
i. ☐ Bad Faith _____
ii. ☐ Multiple filings _____
iii. ☐ Other (describe) _____
d. Debtor's Statement of Intention regarding the Collateral
i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☐ No Statement of Intention Filed

Date: August 21, 2020
(Rev. 6/1/09)

/s/ James M. Philbrick
Counsel for **Ally Financial**